

**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF OKLAHOMA
OKLAHOMA CITY DIVISION**

IN RE:

CASE NO.: 22-12382

Chapter 13

Teresa A Lanier
aka Teresa Ann Lanier
aka Teresa Lanier

James S Lanier
aka Steven Lanier
aka James Steven Lanier
aka James Lanier

Debtors

**NATIONSTAR MORTGAGE LLC'S OBJECTION TO
CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN**

Comes now Nationstar Mortgage LLC ("Creditor"), for its Objection to Confirmation of Chapter 13 Plan states:

1. Debtors filed a Chapter 13 bankruptcy proceeding and a proposed Plan of Reorganization on October 14, 2022.
2. Creditor is a secured creditor of Debtors bankruptcy proceeding.
3. According to Proof of Claim to be filed on behalf of Creditor, its total claim is approximately \$169,730.49 with an approximate prepetition arrearage of \$7,158.01 with an ongoing payment of \$1,674.15, whereas the Plan does not include provisions for repayment of the arrears to Creditor and provides an ongoing monthly payment of \$1,795.00.
4. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed.
5. Secured Creditor objects to any plan which proposes to pay it anything less than its

full pre-petition arrearage over the life of the plan.

6. Secured Creditor reserves the right to supplement or amend this Objection to Confirmation if necessary.

WHEREFORE, Secured Creditor respectfully requests the entry of an Order which denies confirmation of the Plan unless such plan is amended to overcome the objections of Secured Creditor as stated herein, and for such other and further relief as the Court deems just and proper.

Date: November 22, 2022

Respectfully submitted,

By: /s/ Keith A. Daniels
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Attorney for Secured Creditor

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on the 14th day of November, 2022, the creditor's representative or attorney:

_____	made a good faith effort to negotiate a settlement of the dispute with debtor's counsel but a settlement could not be reached and the objection is opposed.
<u> X </u>	made a good faith effort to negotiate a settlement of the dispute with debtor's counsel.
_____	attempted to contact debtor's counsel, but debtor's counsel failed to respond to our communication by the same time on the second business day after such communication.

CERTIFICATE OF SERVICE

I, Keith A. Daniels, certify that a true and correct copy of the Objection to Confirmation of Debtors' Chapter 13 Plan was served to the parties listed below by U.S. Mail, first class, postage prepaid and to the Debtors Attorney, the Chapter 13 Trustee, the U. S. Trustee, and all parties requesting notice via the Court's ECF/Electronic Mail system, all as to guarantee proper delivery this 22nd day of November, 2022:

Teresa A Lanier
2009 Powderhorn
Edmond, OK 73034

James S Lanier
2009 Powderhorn
Edmond, OK 73034

By: /s/ Keith A. Daniels
Marinosci Law Group, P.C., OBA#19788